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Via Email: OetkenNYSDChambers@nysd.uscourts.gov

Hon. J. Paul Oetken
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Tatiana Akhmedova*, Case No. 19-mc-26
Request to Extend Temporary Sealing Order

Dear Judge Oetken:

On May 3, 2019, in response to Applicant Tatiana Akhmedova (“Applicant”)’s request to issue a temporary sealing order in this action, this Court entered an order temporarily sealing the Supplemental *Ex Parte* Application for Discovery Pursuant to 28 U.S.C. § 1782 and proposed order (Dkt. 7, 7-1), the Declaration of James H. Power in support thereof and exhibits attached thereto (Dkt. 8, 8-1), the Memorandum of Law (Dkt. 9) and the Order granting discovery (Dkt. 11). Dkt. 12. The sealing order also provides that the letter request to seal, which might normally be posted to ECF following entry of the requested order, also be sealed. *Id.*

The sealing order provides that the above-listed filings shall be sealed for a period of ninety (90) days, or until July 31, 2019, subject to Applicant’s right to seek a further order of this Court extending the period of time to remain under seal. Dkt. 12. Applicant hereby submits a request to extend the temporary sealing of the above-listed documents through September 15, 2019.

As set forth in Applicant’s prior request for temporary sealing, the documents obtained pursuant to Section 1782 have recently been used in an *ex parte* proceeding in the United Kingdom, wherein Applicant, through her London solicitors, has sought to add certain judgment debtors on the basis of information learned partially through discovery obtained in this action. Applicant hereby advises the Court that the English Proceeding was commenced on July 17, 2019, and that a hearing before the English High Court is currently scheduled for August 15, 2019. Applicant expects that the High Court will issue a ruling on the requested relief by September 15, 2019.

Applicant respectfully relies on the authority set forth in her initial sealing request dated May 1, 2019, namely in the interest of keeping litigation strategy details outlined in the

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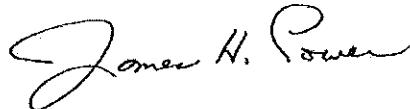
Supplemental Application and supporting documents confidential and kept from view of the adverse parties. Petitioner respectfully submits that good cause exists to extend the sealing for this minimal period under the standard set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006).

Based on the foregoing, Applicant respectfully requests an extension of the temporary sealing order for an additional forty-five (45) day period until September 15, 2019 when she expects to receive *ex parte* relief in the United Kingdom and to provide notice to the respondents in that action. Applicant also respectfully requests that as with the prior motion to seal, that the foregoing letter be temporarily maintained under seal as well.

We thank the Court for its attention to this matter.

Respectfully submitted,

HOLLAND & KNIGHT LLP



James H. Power

Attachments